

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

FEB 12 2003

UNITED STATES OF AMERICA,

Plaintiff,

vs.

RAYMOND SANDOVAL

Defendant.

CRIMINAL INDICTMENT
Count I: 26 U.S.C. § 5861(f);
Unlawful Making of a Destructive
Device; Count II: 26 U.S.C. §
5861(d): Possession of an
Unregistered Firearm; Count III: 18
U.S.C. § 844(h): Unlawful Use of
Explosive Material; Count IV: 18
U.S.C. § 844(i) and 2: Aiding
and Abetting the Attempted
Destruction of Personal Property
with an Explosive Device; Count V:
18 U.S.C. § 924(c): Use of a Firearm
During and in Relation to a Crime of
Violence; Count VI: 18 U.S.C. §
1855: Willfully Setting an
Unauthorized Fire on United States
Forest Service Land or on an Indian
Reservation; Count VII: 18 U.S.C. §
1361: Willfully Injuring the Property
of the United States.

INDICTMENT

The Grand Jury charges:

COUNT I

In or about March, 1999, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, knowingly made a firearm, as defined in 26 U.S.C. § 5845, to wit: a destructive device.

In violation of 26 U.S.C. § 5822, 26 U.S.C. § 5861(f) and 26 U.S.C. § 5871.

COUNT II

On or about the 19th day of March, 1999, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, knowingly possessed a firearm, to wit: a destructive device, not registered to him in the National Firearms Registration and Transfer Record.

In violation of 26 U.S.C. § 5841, 26 U.S.C. § 5861(d) and 26 U.S.C. § 5871.

COUNT III

On or about the 18th day of March, 1999, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, knowingly used explosive material, approximately 81.3 grams of Pyrodex, a low explosive, to commit Unlawful Possession of a Destructive Device in violation of 5861(d), a felony prosecutable in a court of the United States.

In violation of 18 U.S.C. § 844(h).

COUNT IV

On or about the 19th day of March, 1999, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, maliciously attempted to damage and destroy by means of fire and explosive materials personal property, a mailbox and its contents, used in interstate commerce, located at 1411 Second Street, Santa Fe, New Mexico

In violation of 18 U.S.C. § 844(i) and 18 U.S.C. §2.

COUNT V

On or about the 19th day of March, 1999, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, for which he may be prosecuted in a court of the United States, did knowingly carry and use a firearm, to wit a destructive device, during and in relation to a crime of violence for which he may be prosecuted in a court of the United States, namely the malicious attempt to destroy by means of an explosive device personal property used in interstate or foreign commerce, as charged in Count IV of this Indictment.

In violation of 18 U.S.C. § 924(c)(1).

COUNT VI -- The Oso Complex Fire

On or about the 27th day of June, 1998, in the Santa Fe National Forest, in Rio Arriba County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, willfully and without authority, set on fire timber, and underbrush, and grass and other inflammable material in the Santa Fe National Forest.

In violation of 18 U.S.C. § 1855.

COUNT VII

On or about the 27th day of June, 1998, in the Santa Fe National Forest, in Santa Fe County, State and District of New Mexico, the defendant, **RAYMOND SANDOVAL**, did knowingly and willfully injure property of the United States, namely timber, and the damage and attempted damage exceeded \$1000.00.

In violation of 18 U.S.C. § 1361.

Mary J. Higgins
David C. Iglesias
United States Attorney
Lk February 2003

A TRUE BILL

Alfonso Lopez
FOREPERSON